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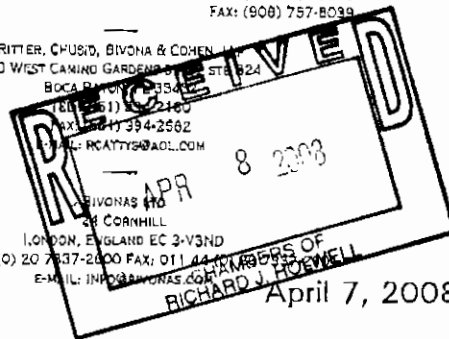
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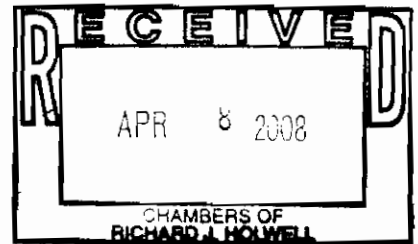
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Honorable Richard J. Holwell
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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RE: DIONISIO POLANCO v. NELMOR CO., INC., AEC NELMOR and
AEC INC.,
Docket Number : 07 CIV 7728
Our File Number : CMI 35-29197 (JMR/RMF-6)

Dear Honorable Judge Holwell:

This office represents the defendants in the above-entitled products liability matter. I am writing to request an extension of time as described below.

This request is being made with the consent of the plaintiff's counsel and no prior request for an extension of time has been made in this case by either party.

An Initial Scheduling Order was issued on December 3, 2007 and required that fact discovery be completed by April 18, 2008. A status conference was scheduled on April 25, 2008.

The parties have been proceeding with discovery but it appears that we will not be in a position to complete fact discovery by April 18, 2008. Several items of

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discovery remain outstanding including depositions. The plaintiff's deposition is scheduled to be held on April 18, 2008 and the deposition of the defendant via an out-of-state witness is being arranged.

The plaintiff's counsel recently provided authorizations allowing the defendants to obtain copies of the plaintiff's medical and other records. Upon receipt of these records the defendants will designate a physician to conduct a physical examination.

The plaintiff attorney recently served a demand for production of documents and the defendants are gathering the required materials.

Counsel estimate that an additional 90 days will be required to complete fact discovery. Therefore, on behalf of all parties it is jointly requested that the Court extend the time to complete fact discovery and extend the time for the other provisions of the Initial Scheduling Order consistent with the completion of fact discovery in or about July 2008.

*All dates extended by 90 days
No further extensions. A
status conference shall be
held on October 17, 2008*

RMF/ejs

Respectfully submitted,

[Signature]
RICHARD M. FEDROW

at 10:30 AM

Cc:

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SO ORDERED
[Signature]
UJWJ
4/14/08